IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

VS.

Case No. 4:21-mj-00088-SAO

VINCE JAY BARCELON DELIGUIN,

Defendant.

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Lisa Watson, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging VINCE DELIGUIN with violations of 18 U.S.C. § 2251(a) (sexual exploitation of a minor).
- 2. The facts set forth in this affidavit are based on my personal knowledge; knowledge obtained from other individuals, including other law enforcement officers; interviews of persons with knowledge of the crimes; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is

submitted for the limited purposes of establishing probable cause to support a complaint and securing an arrest warrant, I have not included each and every fact known to me during this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and attached Complaint.

3. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been since January 2010. In this assignment I have investigated a number of violations of United States Code. I am currently assigned to the FBI Anchorage Field Office, and specifically assigned to work violent crimes against children and human trafficking investigations, including but not limited to internet crimes against children, online enticement of children, child pornography possession and distribution, and commercial sexual exploitation of children. I have also conducted investigations of civil rights violations and public corruption. I have conducted and participated in numerous search warrants, arrest warrants, and interviews of people involved in various crimes.

PROBABLE CAUSE

4. On 5/14/2021, MINOR VICTIM (15 years old), reported to his mother that he had been blackmailed/coerced into performing sexual acts on three previous occasions, was being solicited by the suspect(s) to perform the act again that evening, and they (the suspect(s)) would not leave him alone. MINOR VICTIM (MV) was in fear the suspect(s) were watching his house.

- 5. MV's mother contacted the Alaska State Troopers (AST) and MV was interviewed by AST that same night, 5/14/2021. The following is a summary of AST's interview with MV.
- 6. In summary, MV stated he had been a victim on three separate occasions, where sexual acts were forced upon him by means of coercion and blackmail. Pictures and videos were captured on a cell phone camera of him receiving "blow jobs" from an adult he was familiar with.
- 7. A day or so prior to 4/22/2021, MV was solicited by "Marley Madden" via Snapchat. This was the first MV had heard of Madden. He did not know her and had never met her. Madden's profile picture was that of an attractive young woman. Madden claimed to be from the Anchorage area. Madden requested MV send her a "naked" photo of himself, which he did. In reflection, MV realized this was irresponsible of him. He has since experienced thoughts of self-harm, shame, embarrassment, and resentment. At the time "Madden" first contacted him he believed she was real, but at the time of his interview with AST, he no longer believed she exists.
- 8. On 4/22/2021, MV was instructed by Madden, or "the account" as he referred to it, via Snapchat and/or text messages, to meet at Larch Park (a playground/park located in Kodiak, Alaska) for oral sex (in the form of fellatio). MV tried to avoid the encounter, but Madden threatened to release the naked photo she had of him to his family, friends, and others

to see. Madden specifically threatened to send the photo to a girl MV had a crush on at school.

MV eventually succumbed and agreed to meet with Madden.

- 9. When MV went to the park, Madden was not there, but "Vince-Jay" was. MV had been acquainted with Vince-Jay for about one year, as they met in school after MV moved to Kodiak. Vince-Jay used to live near MV and was a frequent attendant of the Middle/High School volleyball games and practices. Vince-Jay was an assistant to the coaches and MV looked up to him, especially when it came to volleyball. Vince-Jay had graduated from Kodiak High School in 2020 and remained a manager for the volleyball team. Vince-Jay is known to be "gay". MV was also associated with Vince-Jay on Snapchat.
- 10. During that first meeting with Vince-Jay (further identified by AST as Vince Jay Barcelon Deliguin), Deliguin performed a "blow job" on MV and Deliguin recorded the encounter with his cellular phone. Deliguin said it (the recording) "was proof for Marley".
- 11. On 5/3/2021, Madden sent another Snapchat message to MV, instructing MV to meet Deliguin again at Larch Park and threatening to "release the video" if MV did not comply. MV understood this threat to refer to the video Deliguin recorded during the first encounter. For a second time, MV met with Deliguin, Deliguin performed oral sex on MV, and video recorded the encounter.
- 12. For MV's third and final in-person encounter with Deliguin, Madden made the same demands of MV as for their previous encounters. After her promise of, "this is the last time and the pictures go away", MV decided it was best to just do what Madden asked.

 Madden made the demands of him and Deliguin set up the meeting. Deliguin met MV at the

"Little Store" and drove MV to another location in Deliguin's vehicle. Delguin then performed oral sex on MV and videotaped the encounter.

- 13. MV deleted Madden from his Snapchat account after the third incident.
- 14. On 5/14/2021, MV received Facebook messages from "Marley Madden". The messages were from a newly created account. Madden demanded MV and Deliguin would be "fucking", which MV understood to be penial/anal intercourse. MV had not been okay with anything that had happened to him so far but knew for sure he could not allow the pain to continue and was "not gay", so it would be difficult to do what Madden wanted. MV sent Madden a Facebook message and refused to have sex with Deliguin. Minutes later, MV received a message from Deliguin on Snapchat saying they "just have to do the same as last time, if that makes you feel better". MV did not meet with Deliguin, but instead told his mother and AST about the abuse.
- 15. AST performed checks in various law enforcement databases, and there were no records for Marley Madden. AST performed an open-source search of Madden's Facebook account, which was created on 5/6/2021, contained only two photos, and appeared to be a fake account.
- 16. On 5/19/2021, AST was granted a state Electronic Monitoring and Recording Search Warrant (3KO-21-64SW). On the same day, MV notified AST that Madden had contacted him again via Facebook Messenger, stating, "do not think you're out of it" and threatening to show pictures and videos. MV met with AST that evening and executed the state warrant.

- During the execution of the state warrant, MV replied to Madden on Facebook. Madden did not immediately respond. MV suggested he reach out to Deliguin, which he often did in the past to get clarification on Madden's demands. As MV opened his Snapchat account and was thinking of what to say to Deliguin, Deliguin was already typing his reply, which the AST Investigator read as, "before you say something, yes the account did text me", "but I wanna hear what you have to say before I tell you", "is that what you wanted to say?".
- 18. Deliguin went on to solicit MV about "finishing this tonight", explaining he "needed an answer for the account before 10 pm". MV understood Deliguin to mean they had to do oral sex again like the previous times and video record it for proof. MV replied with various reasons he could not meet, but Deliguin replied that "he understood and would make it quick". Deliguin continued to claim it would be the last time.
- 19. MV reached out to Madden via Facebook while sending Snapchat messages to Deliguin, and it was determined that Madden had not replied since Deliguin began his conversations on Snapchat with MV nearly one hour prior. MV commented on that fact to Deliguin, and almost immediately received a reply from Madden on Facebook, stating, "last time, I already said didn't I?".
- 20. Continuing into the evening of 5/19/2021 and with the knowledge of ASTMV made arrangements to meet with Deliguin.. AST then responded to the agreed-upon meeting place at the agreed time. Upon AST's arrival, Deliguin was already there, parked in his vehicle. AST arrested Deliguin at that time. Deliguin's cellular phone was observed in plain sight by AST in his vehicle. Both the phone and the vehicle were seized by AST.
 - 21. Deliguin was interviewed by AST. In summary, Deliguin stated the following:

- 22. He used his cellular phone to communicate with MV on Snapchat. He knew or had reason to believe MV was underage, knew what he did was wrong, had in fact performed "blow jobs" on MV three times and videotaped each occurrence. He stated the video was then sent to Madden as proof via Snapchat. Deliguin said MV had given consent each time and MV had "finished" (ejaculated) each time.
- 23. Deliguin first met MV while Deliguin was helping at the school when MV was in 8th grade. Deliguin described his position with the junior high/high school volleyball teams as manager/assistant to the coaches, where he would provide students like MV with the "essentials" and skills for passing and serving the ball, among other things. This was where Deliguin described having the most interaction (separate from the in-person sex acts) with MV.
- 24. Deliguin claimed to have been solicited by Madden to do the sex acts and he did not know why she chose him and MV as partners. He admitted a sort of sexual gratification from what had happened.
- 25. Emails addressed to vincejaydeliguin1569@gmail.com were reviewed by AST, to include, but not limited to two emails from Facebook. One email from Facebook, dated 5/6/2021, stated, "Hey Marley, you recently registered for Facebook" and went on to request the account holder confirm registration. On the same date, a second email from Facebook stated, "Hi Marley, your primary email address has been changed..."
- 26. AST served a state search warrant, 3KO-21-81 SW, to Facebook for account marley.madden.14. Facebook records for the account with the username Marley Madden showed that the registered email was vincejaydeliguin1569@gmail.com, and showed the account was created on 5/6/2021. Between 5/15/21 and 5/20/2021, the Marley Madden

account communicated via chat messages with MV and were as follows (MV's identifying information has been redacted):



But not the videos

Sent 2021-05-15 03:20:04 UTC

Body Everytime you say last time you always text me again saying the same thing

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 03:20:14 UTC
Body Do it again with the same person, and i delete the videos

Sent 2021-05-15 03:20:51 UTC

Body Im begging you to please leave me alone if i do it ONE LAST TIME

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 03:20:57 UTC
Body Fine

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:21:05 UTC Body Just know he doesn't know anything

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 03:21:09 UTC
Body You have to explain to him

Author Sent 2021-05-15 03:21:32 UTC

Body Fine but please leave me alone after this

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 03:21:57 UTC
Body I'll see about that

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:22:09 UTC

Body But do you want me to show or anyone else?

Body No please

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:22:55 UTC Body Okay then meet up with him sometime later

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:23:00 UTC Body When are you available?

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 03:23:15 UTC
Body Just let him know I don't wanna be a part of it

Author Sent 2021-05-15 03:23:30 UTC

Body I'll see cuz im moving houses this weekend

Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:23:40 UTC Body Gotta do it tonight Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:23:49 UTC Body Thats what i have to say Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:23:54 UTC Body Tonight, only tonight Sent 2021-05-15 03:24:11 UTC Body Ok and if i do it tonight you'll leave me alone after that? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:24:24 UTC Body Stop asking me that or else i'll show people Sent 2021-05-15 03:24:32 UTC Body Fine Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:25:29 UTC Body Explain everything to him. Sent 2021-05-15 03:25:44 UTC Body Yeah im about to do that Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:25:52 UTC Body He doesn't know a thing and if you decide to delete or block me or mute me and i find out, i will show everything to anyone Author Sent 2021-05-15 03:26:09 UTC **Body** Fine Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:37:21 UTC Body Have you done it Sent 2021-05-15 03:37:33 UTC Body Yeah Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:37:54 UTC Body Your fucking him you know that

29.

Author

Sent 2021-05-15 03:38:12 UTC Body What the fuck

Author Marley Madden (Facebook: 100067604141938)

Sent

2021-05-15 03:38:28 UTC

Body What

Sent 2021-05-15 03:38:46 UTC

Body Why do you do this to me

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 03:38:46 UTC

Body Don't tell him that

Sent 2021-05-15 03:39:22 UTC Body Why do you do this to me

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 05:21:25 UTC

Body So i heard you did not wanna do it..... If I promise you i will leave you alone if you do this, do it tonight

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 05:21:31 UTC Body And that will be my final decision

Author

Sent 2021-05-15 05:22:36 UTC

Body I will do it if you leave me alone because thats all i want from you

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 05:22:45 UTC

Body Fine

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 05:25:21 UTC

Body Since it will be the last time, go all out

Author

Sent 2021-05-15 05:26:07 UTC Body What does that mean i have to do

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 05:26:47 UTC

Body Be into it

Author

Sent 2021-05-15 05:27:28 UTC

Body I'll try my best cuz im not gay so thats difficult

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 05:27:46 UTC

Body Well you better force it

Author Sent 2021-05-15 05:27:57 UTC

Body Fine

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 06:35:50 UTC

Body What time are you doing it Author Sent 2021-05-15 06:36:07 UTC Body Maybe around 11 or 12 Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 06:36:19 UTC Body Any chance right now? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 06:36:21 UTC Body Or 11? Author 2021-05-15 06:36:37 UTC Body Probably 11 Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 06:36:46 UTC Body You better Sent 2021-05-15 06:37:00 UTC Body Fine Author Marley Madden (Facebook: 100067604141938) **Sent** 2021-05-15 06:38:39 UTC **Body** Send me a pic m Author Sent 2021-05-15 06:39:02 UTC Body No Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 06:58:38 UTC Body So what time Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:00:08 UTC Body Hello? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:03:25 UTC Body Are you really just reading my text messages? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:07:05 UTC Body Don't test me Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:20:41 UTC Body You called Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:20:48 UTC Body Helllooo

Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:20:58 UTC

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 07:21:57 UTC
Body You called

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:22:07 UTC

Body Hey!

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 07:23:24 UTC

Body Are you doing it tonight or what

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 07:23:38 UTC Body Why aren't you answering?!

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 07:23:52 UTC Body I'm getting furious

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 07:26:26 UTC
Body I said i will leave you alone

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 07:31:53 UTC
Body You called

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:32:10 UTC

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-15 07:33:41 UTC
Body

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 07:41:18 UTC

Body If youre not answering tell him at least

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:41:32 UTC

Body Wasting both our times waiting for you nothing to answer

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 07:41:47 UTC

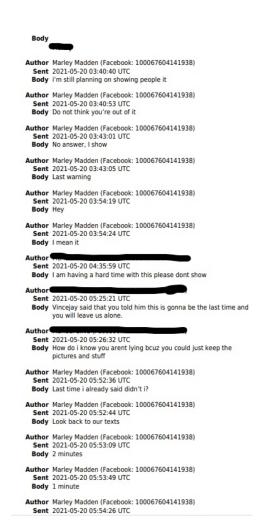
Body We both need an explanation

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-15 08:22:06 UTC

Body Hey

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-15 08:32:38 UTC 32.



Body 30 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:54:27 UTC Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:54:31 UTC Body 28 Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:54:34 UTC Body 27 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:54:38 UTC Body 26 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:54:40 UTC Body 25 Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:54:44 UTC Body 24 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:54:48 UTC Body 23 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:54:53 UTC Body 22 Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:54:54 UTC Body 21 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:55:00 UTC Body 20 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:55:15 UTC Body 19 Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:55:17 UTC Body 18 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:55:21 UTC Body 17 Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 05:55:24 UTC
Body 16

Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:55:28 UTC Sent 2021-05-20 05:55:30 UTC Body | told him **Author** Sent 2021-05-20 05:55:36 UTC Body Stop spamming Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:55:39 UTC Body Good now hurry up Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:55:41 UTC Body Or else Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:59:50 UTC Body So what time did he start texting you? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 05:59:55 UTC Body And what time is it now? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:00:17 UTC Body And you didn't answer his question until just recently? Author Sent 2021-05-20 06:00:31 UTC Body Trying to figure out a place to meet rn Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:00:57 UTC Body He has a car, you told him you moved? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:06:01 UTC Body Since all of you have excuses, what about send me a video of you Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:06:03 UTC Body Only you Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:06:13 UTC Body Full on jerking until you cum with face and fully naked? Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:06:37 UTC **Body** You tape yourself from your front camera, with face and fully naked until you cum?

Sent

2021-05-20 06:06:52 UTC

Body Im about to leave the house in a bit tho to go meet up vincejay

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:07:12 UTC

Body Well don't, he told ne you have a reason on why you can't leave the house

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 06:07:21 UTC

Body And i dont want you in trouble

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:07:29 UTC

Body So i'm keeping you safe

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:07:57 UTC

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:08:19 UTC Body Don't leave your house

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:08:43 UTC

Body Hey

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:08:53 UTC

Body Well? You like this way better?

Sent 2021-05-20 06:09:34 UTC

Body Well that'll give you more videos to use against me more and i

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:09:40 UTC

dont want that

Body I won't

Author Marley Madden (Facebook: 100067604141938) Sent 2021-05-20 06:09:43 UTC

Body Do it this way

Author Marley Madden (Facebook: 100067604141938)

Sent 2021-05-20 06:09:50 UTC Body Hurry and start sending it

Author Marley Madden (Facebook: 100067604141938)
Sent 2021-05-20 06:10:04 UTC
Body START

Sent 2021-05-20 06:10:09 UTC

Body I cant really trust you because of the situations you put me in before



38. Based on my training and experience, along with the facts stated above, I believe Marley Madden was not a real person, and that Vince Deliguin created and/or operated the Facebook account, "Marley Madden", to communicate with MV.

Respectfully submitted,

Lisa Watson

Special Agent, FBI

Child Exploitation Task Force

Subscribed-and sworn to before me

before this 21st day of September, 2021:

HON. SCOTT A. ORAVEC

UNITED STATES MAGISTRATE JUDGE

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender:	
Known aliases:	
Last known residence:	
Prior addresses to which defendant/offender may still have ties:	
Last known employment:	
Last known telephone numbers:	
Place of birth:	
Date of birth:	
Social Security number:	
Height:	Weight:
Sex:	Race:
Hair:	Eyes:
Scars, tattoos, other distinguishing marks:	
History of violence, weapons, drug use:	
Known family, friends, and other associates (name, relation, address, phone number):	
FBI number:	
Complete description of auto:	
Investigative agency and address:	
Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable):	
Date of last contact with pretrial services or probation officer (if applicable):	